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9 *Wal-Mart Stores, Inc.*

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

11 DONG “KEVIN” GUO,

12 Plaintiff,

13 v.

14 WAL-MART STORES, INC., a foreign  
corporation; DOE WORKER, an individual;  
15 DOES 1 through 10, inclusive; and ROE  
CORPORATIONS 1 through 10, Inclusive,

16 Defendants.

Case No.: 2:18-cv-00179-GMN-PAL

**STIPULATION AND [PROPOSED]**  
**ORDER TO EXTEND DISCOVERY**  
**DEADLINES**

**[FIRST REQUEST]**

17 Plaintiff DONG “KEVIN” GUO (hereinafter “Plaintiff”) and Defendant WAL-MART  
18 STORES, INC. (hereinafter “Defendant”) (collectively, the “Parties”), by and through their respective  
19 counsel of record, do hereby stipulate to extend the remaining deadlines in the current Discovery Plan  
20 and Scheduling Order in this matter for a period of sixty (60) days for the reasons explained herein.

21 Pursuant to Local Rule 6-1(b), the Parties hereby aver that this is the first such discovery  
22 extension requested in this matter.

23 **DISCOVERY COMPLETED TO DATE**

- 24
- 25 • The Parties have conducted their FRCP 26(f) conference and have served their respective FRCP  
26 26(a) disclosures.
  - 27 • Defendant served its FRCP 26(a) Initial Disclosures with exhibits thereto on March 26, 2018.
  - 28 • Plaintiff served her FRCP 26(a) Initial Disclosures with exhibits thereto on April 3, 2018.
  - Defendant propounded Requests for Admissions, Requests for Production of Documents, and

Interrogatories upon Plaintiff.

- Defendant noticed he deposition of Plaintiff.
- The Parties have begun to meet and confer regarding written discovery, authorizations, and the FRCP 35 medical examination.

**DISCOVERY TO BE COMPLETED AND REASONS FOR EXTENSION OF DISCOVERY**

Discovery to be completed includes:

- Plaintiff's execution of HIPAA-compliant authorizations for Defendant to obtain his medical and employment records.
- Deposition of Plaintiff (currently noticed for May 25, 2018).
- Deposition of fact witnesses.
- Deposition of Defendant's employees.
- Plaintiff's responses to Defendant's propounded Requests for Admissions, Requests for Production of Documents, and Interrogatories.
- Deposition of Defendant's FRCP 30(b)(6) representative(s).
- Depositions of Plaintiff's treating providers.
- Depositions of Plaintiff's employers.
- FRCP 26(a)(2) designation of expert and rebuttal expert witnesses.
- Depositions of expert and rebuttal expert witnesses.
- FRCP 35 examination of Plaintiff.
- FRCP 34 site inspection of the subject premises.
- Additional written discovery and depositions as the Parties deem necessary.

The Parties aver, pursuant to Local Rule 6-1, that good cause exists for the requested extension. The Parties agree that, pending this Court's approval, extension of remaining discovery deadlines is appropriate, as Defendant is still in the process of obtaining Plaintiff's medical records. Further, the Parties wish to further investigate this case by conducting additional depositions of important witnesses prior to initial expert disclosures in an effort to determine if resolution of this matter may be reached prior to incurring fees and costs associated with disclosing experts and their respective opinions.

**[PROPOSED] NEW DISCOVERY DEADLINES**

<b>Amending the Pleadings and Adding Parties</b>	<b>June 29, 2018</b>
<b>Interim Status Report</b>	<b>July 30, 2018</b>
<b>Expert Disclosure Deadline</b>	<b>July 30, 2018</b>
<b>Rebuttal Expert Disclosure Deadline</b>	<b>August 29, 2018</b>
<b>Discovery Cut-Off Date</b>	<b>September 28, 2018</b>
<b>Dispositive Motion Deadline</b>	<b>October 26, 2018</b>
<b>Proposed Pre-Trial Order</b>	<b>November 26, 2018</b>

If this extension is granted, all anticipated additional discovery should be concluded within the stipulated extended deadline. The Parties aver that this request for extension of discovery deadlines is made by the Parties in good faith and not for the purpose of delay.

DATED this 27th day of April, 2018.

**GANZ & HAUF**

*/s/ Jeffrey L. Galliher*

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*Attorneys for Plaintiff  
Dong "Kevin" Guo*

DATED this 27th day of April, 2018.

**PHILLIPS, SPALLAS & ANGSTADT, LLC**

*/s/ Pooja Kumar*

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**IT IS SO ORDERED.**

  
UNITED STATES MAGISTRATE JUDGE

DATE: May 15, 2018